

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

AMERICAN ENTERPRISES, INC., SAFETYHOUSE.COM,	ENVIRONMENTAL d/b/a THE
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Plaintiff,

v.

MANFRED STERNBERG, ESQUIRE, and MANFRED STERNBERG & ASSOCIATES, PC, and CHARLTON HOLDINGS GROUP, LLC, and SHLOMO GROSS a/k/a SAMUEL GROSS, and GARY WEISS, and A.SOLAR, LLC, and DAPHNA ZEKARIA, ESQUIRE, and SOKOLSKI & ZEKARIA, P.C.	
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Defendants

CIVIL ACTION

No. 2:22-CV-0688 (JMY)

NOTICE OF MOTION FOR PROTECTIVE ORDER

PLEASE TAKE NOTICE that undersigned, as counsel of record for Defendants, Daphna Zekaria, Esquire and Sokolski & Zekaria, P.C. (hereinafter "Zekari Defendants"), will move this Court for a Protective Order to prohibit any party from noticing the depositions of the Zekaria defendants and/or conducting any discovery against the Zekaria defendants until a decision is made on the pending Motion to Withdraw

PLEASE TAKE FURTHER NOTICE that this motion is accompanied by a proposed form of Order.

PLEASE TAKE FURTHER NOTICE that Rebar Kelly reserves its right for oral argument in the event timely opposition is filed with the Court.

PLEASE TAKE FURTHER NOTICE that this matter has not been scheduled for trial.

Respectfully submitted

REBAR KELLY


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Esquire and Sokolski & Zekaria, P.C.

DATE: May 23, 2024

CERTIFICATE OF SERVICE

Patrick J. Healey, Esquire, hereby certifies that a true and correct copy of the within Motion has been served upon counsel listed below by the Court's electronic filing system and via electronic mail:

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DATE: May 23, 2024

